

4. As such, Plaintiff and Defendants move the Court to extend Defendants' deadlines to answer or otherwise respond to the Complaint to January 11, 2024.

5. The request for extension will provide time for the parties to further investigate the facts of their respective cases and determine what facts are in dispute and whether the matter can be resolved without Defendants expending attorneys' fees for filing a motion for leave to amend, preparing an answer or otherwise responding to the Complaint.

6. Wherefore, Plaintiff and Defendants move the Court to extend Defendants' answer dates until January 11, 2024 and otherwise stay the proceedings and for such further action as the Court finds necessary to enable the parties to attempt to resolve this matter.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify a true and correct copy of this document has been served on all counsel of record via the Court's ECF system on November 27, 2023.

/s/ Lisa P. Alcantar
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